



September 14, 2021

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Minister of Agriculture and Agri-Food: [minister\\_ministre@agr.gc.ca](mailto:minister_ministre@agr.gc.ca)

Minister of Environment and Climate Change: [ec.ministre-minister.ec@canada.ca](mailto:ec.ministre-minister.ec@canada.ca)

The National Council of Women of Canada (NCWC) has warned the Government of Canada of the dangers of pesticide residues on the food Canadians eat, whether grown here or imported, since we first developed policy on this issue in 1990, and subsequently in 1994, 2002 and 2014.<sup>1</sup> And, in 1998, 1999, and 2001<sup>2</sup> the NCWC urged Health Canada to use the precautionary principle to ensure public health comes first when regulating Genetically modified crops, and refrain from allowing the self-interested private sector chemical, seed and pharmaceutical companies to gain control.

Therefore, we find it commendable that the Ministers of Health, Agriculture and Agri-Food, and Environment and Climate Change have paused Health Canada plans to raise Maximum Residue Levels (MRLs) for some Canadian food crops, and by default imported foods, to double or more the current maximum residue level<sup>3</sup>, remove food residue regulations from several new genetically modified/engineered foods and plants, and to allow food companies to determine the safety of these in the market place<sup>4</sup>.

This delay is a wise precautionary move, since very recently, an expert study and analysis has shown that European Union Authorities had accepted faulty safety studies from the pesticide industry<sup>5</sup>. As well, the World Health Organization's International Agency for Research on Cancer reported earlier this year that there is strong evidence that exposure to glyphosate is genotoxic and is probably carcinogenic to humans as well and that farm workers and children are particularly at risk<sup>6</sup>.

The NCWC is also pleased to see the Ministers' commitment to enhance transparency and science-based regulation on pesticides and asks that this be prioritized in all regulation of genetically engineered foods. We also believe it is paramount that Health Canada and the Canadian Food Inspection Agency (CFIA) retain their regulatory authority over all genetically engineered products, even those with no foreign DNA, and in reviewing the proposed Health Canada and CFIA proposals, adhere to their

precautionary mandate “to prevent unacceptable risks to individuals and the environment from the use of pest control products”<sup>7</sup>

In doing so, it is crucial to heed the warnings of the Canadian Biotechnology Action Network, which does research, monitors, and raises awareness about genetic engineering in food and farming. Of particular interest to the NCWC is the input of CBAN’s member group, the National Farmers’ Union, which so clearly understands all the life cycle aspects of farming, has contracted reliable studies to critique the proposed loosening of regulations, and speaks in the interest of both the farmer and the general health and welfare of the public.

Sincerely

Patricia Leson, President  
National Council of Women of Canada

***The National Council of Women of Canada (NCWC) works in the spirit of truth and reconciliation, acknowledging Canada is the traditional territory of Indigenous and Metis People. We are grateful to join with others in peace and hope, advocating for an improved quality of life for women, children, families, and society.***

**Note:** The original draft of this letter was prepared by Gracia Janes, NCWC Environment Convenor.

cc. Health Canada: [hc.bmh-bdm.sc@canada.ca](mailto:hc.bmh-bdm.sc@canada.ca)  
Canadian Food Inspection Agency [cfia.pbo-pbo.acia@canada.ca](mailto:cfia.pbo-pbo.acia@canada.ca)

## References:

### 1. National Council of Women of Canada Policies Pesticides

#### **a ) 1990.3 Pesticide Residue on Imported Fruit and Vegetables**

RESOLVED, that The National Council of Women of Canada urge the Government of Canada to act on the suggestion contained in the Auditor General’s Report of December 1988 to quadruple (border) checking for harmful pesticide residue on imported fruits and vegetables.

#### **b) 1994.03 Update**

RESOLVED, that the National Council of Women of Canada urges the Government of Canada to continue to:

1. Research and monitor the use of pesticides in Canada;

2. Expedite the development of the necessary legislation to control or restrict the use of pesticides when research indicates a need for such legislation
3. Regulate and improve management practices for pesticides and enforce such regulations;
4. Monitor imported fruits and vegetables for the pesticides used in the country of origin and alert the public to possible pesticide residues on such food or ban their import.

**c) 2002.05EM**

RESOLVED: that the National Council of Women of Canada urge the Government of Canada to:

- 1): exercise the precautionary principle in decisions affecting the registration and use of pesticides, so that registration does not take place where there is doubt about the safety of a pesticide;
- 2) support research and promotion of alternatives to traditional pesticide and herbicide uses,
- 3) re-evaluate pesticides which have been in use for many years and ban their use if modern science does not find that they meet current safety standards, and
- 4) provide leadership to eliminate the use of pesticides for cosmetic purposes and take leadership in informing the general public about the use of pesticides and possible harmful effects.

**d) 2014.04 Moratorium on the Use of Neonicotinoid Pesticides on Farm Crops**

Whereas 1 a third of our food supply relies on pollinators, particularly bees; and

Whereas 2 numerous peer-reviewed scientific studies have concluded that neonicotinoid pesticides pose a significant threat to bees and other wildlife and Canada's Pest Management Regulatory Agency (CPMRA) has documented those extensive losses in 2012 of honey bees and other pollinators can be attributed to their use on farm crops; and

Whereas 3 neonicotinoid pesticides leach into soils, groundwater and waterways, can accumulate on clay soils and can persist for years, killing bees, and other pollinators such as aquatic insects and birds, and

Whereas 4 while farmers believe neonicotinoids bolster crop yields, there are no studies to prove that this is true over the long term and some scientific studies have proven otherwise; therefore, be it

Resolved 2 that NCWC urge the Government of Canada to place a moratorium on the use of neonicotinoid pesticides on farm crops.

**2. National Council of Women of Canada Policies on GMOs**

**a 2000.04PU GENETIC ENGINEERING/RESEARCH**

Whereas: in 1998 the National Council of Women of Canada adopted a resolution Mandatory Labeling and Long-Term Testing of Genetically Engineered Foods which urged the Government of Canada to: impose immediate mandatory labeling of all foods containing genetically engineered ingredients; impose a moratorium on the distribution and sale of genetically engineered foods until they have been adequately tested in Canada by a Federal Government Bureau and proven safe; and alert the public by TV, radio and written media as to the presence and possible effects of genetically engineered foods; and

Whereas: in 1999, the National Council of Women of Canada adopted policy which urges the Government of Canada to ensure that an independent Health Protection Branch tests all health and food products; and

Whereas: human beings depend for their nutrition and very survival on basic food crops; and

Whereas: scientific technology has enabled scientists to go far beyond and away from traditional grafting and cross breeding techniques used by plant scientists and farmers for millennia, to interventions in fundamental genetic makeup of plants; and

Whereas: while there may be potential benefits to farmers and consumers, harm may also accrue from the little-known long-term effects on the health, resiliency, genetic diversity and sustainability of seeds, the environment and human health; and

Whereas: a very few chemical seed and pharmaceutical companies, who stand to profit enormously, are increasingly monopolizing the production and distribution of genetically engineered seeds through patenting and restrictive farm contracts; and

Whereas: these same companies have increased control of genetic research through the direct funding and control of university and institutional labs and through in-house product testing for (in absence of) government testing; and

Whereas: monies from chemical, seed and pharmaceutical companies as well as governments are being directed away from more traditional proven plant breeding techniques; and

Whereas: there is little incentive under present commercial law for the commercial seed producer to consider the long-term health of the public ahead of its own short term commercial gain and to date there is no way for the public to know if a food product contains genetically modified components and to protect Canadians from possible harm; therefore, be it

RESOLVED: that the National Council of Women of Canada urge the Government of Canada to:

- a. ensure sufficient funding to food health and research institutions to ensure their independence from commercial interests and commitment to long-term public good as it relates to the health, resiliency, genetic diversity and sustainability of seeds, the environment and human health; and
- b. that the precautionary principle be applied where the environment, health and nutrition are involved, so that food testing requires toxicological, immunological and biological tests as well as the current standard chemical tests; and
- c. that food tests be done by Health Canada internally or by independent food health and research institutions, rather than by profit-oriented companies; and
- d. make it mandatory that all foods with a Genetically Modified component be clearly labeled.

### **3. National Farmers Union Submission to Pest Management Regulatory Agency Consultation on Glyphosate, Proposed Maximum Residue Limit PMRL2021-10**

page 2. *“MRLs are set by nations to set standards for imported foods. The proposed increase in MRLs mean that imports of dry beans, lentils, chickpeas, etc. will be legally permitted to have double or more the current glyphosate residue present. Canadian farmers exporting will be subject to the importing country’s MRL limits. Raising Canada’s MRL increases the allowable residue in foods consumed by Canadians whether they are imported or domestically produced.”*

### **4. Canadian Biotechnology Action Network (CBAN) Comments to Health Canada and CFIA.** Health Canada and CFIA proposals for new regulatory guidance on the safety assessment of genetically engineered foods and plants July 21<sup>st</sup>, 2021.

*“The CFIA’s proposal would allow private companies to sell some GMOs (genetically modified organisms) **without government environmental risk assessments**. Instead, many new genetically engineered plants would be assessed for environmental safety **by the product developers themselves**, with no government oversight. Specifically, the CFIA proposes to exempt genetically engineered seeds that have no foreign DNA, many of which would be produced with the new genetic engineering techniques of genome editing (also called gene editing).”*

**5. Ibid.** CBAN public notice August 17<sup>th</sup> 2021 Guide to CFIA’s Consultation News Articles European Press : *“A 187 –page expert analysis shows that EU authorities accepted faulty studies from the pesticide industry. .Europe’s glyphosate scandal was all over the news last weekend.”*

**6. ibid** *“In 2015, the World Health Organization’s International Agency for Research on Cancer (IARC) classified glyphosate as “probably carcinogenic to humans” after reviewing years of published and peer-reviewed scientific studies. The team of international scientists found there was a particular association between glyphosate and non-Hodgkin lymphoma.*

**7. National Farmers Union Submission to Pest Management Regulatory Agency  
Consultation on Glyphosate, Proposed Maximum Residue Limit PMRL2021-10**